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Docket Management System (DMS)
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW
Washington, D.C. 20591



Docket Number: FAA—2003—15085 - 41

Subject: Boeing Response to 14CFR Part 119, et al. Hazardous Materials
Training Requirements; Proposed Rule

Boeing review of Proposed Rule 14CFR Part 19 et al, dated 8 May 2003 has resulted in one specific comment. When this comment is addressed, Boeing believes that adoption of the rules in proposed 14CFR 19 et al will prove beneficial to safety and continued airworthiness of civil aviation products by helping to detect and prevent the improper handling and shipping of hazardous materials.

Boeing recommends that the following changes be incorporated into the proposed rule prior to publication:

Add section 14CFR145.5(c) as follows:

- (c) Repair stations performing functions listed in §145.5(b) for more than one certificate holder, and having in place a training program meeting the requirements of § 145.5(a), must either:
 - (1) Receive training from the certificate holder(s) in the certificate holders' policies and procedures for those requirements listed in § 121.801(a) and maintain documentation of this training; or,
 - (2) Receive and maintain written authorization from a responsible person representing the certificate holder(s) acknowledging the adequacy of the training program of the repair station, and its use in lieu of the certificate holders own procedures. This written authorization shall include the "Will-Carry" or "Will-Not-Carry" status of the certificate holder(s). If training for specific responsibilities is required by a certificate holder, such training will be provided by the certificate holder.

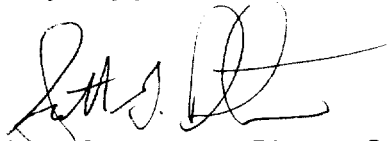
Boeing believes it is adequate if a certificate holder verifies the adequacy of the controls in the processes, procedures, and training of TRF responsibilities of people handling and shipping hazardous materials for a repair station. Such verification is adequate to meet the intent of the rulemaking and the individual certificate holder responsibilities. The option to require specific training if deemed

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necessary provides flexibility to both certificate holders and repair stations while maintaining adequate controls to ensure the proper handling and shipping of hazardous materials, and the continued safety of aircraft and personnel.

If I can be of further assistance, please contact me at the number below or contact W. K. Bowden, at wk.bowden@boeing.com.

Very truly yours,



Scott G. Peterson, Director Quality
BCA Regulatory Administration
PO Box 3707, MC 6X-UT
Seattle, WA 98124-2207
(425) 237-7967

